Louisiana-Pacific Corporation	**)**	**Department**
Washington County	**)**	**Findings of Fact and Order**
Baileyville, Maine	**)**	**Part 70 Air Emission License**
A-126-70-A-I	**)**	

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

FACILITY	Louisiana-Pacific Corporation (Louisiana-Pacific)
LICENSE NUMBER	A-126-70-A-I
LICENSE TYPE	Initial Part 70 License
NAIC CODES	321219
NATURE OF BUSINESS	Oriented Strand Board Manufacturer
FACILITY LOCATION	Baileyville, Maine
DATE OF LICENSE ISSUANCE	December 28, 2004
LICENSE EXPIRATION DATE	December 28, 2009

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Boiler	190 MMBtu/hr Wood	Fuel burning
Surface Dryer	40 MMBtu/hr Wood 25 MMBtu/hr Propane	Process equipment w/fuel burning
Core Dryer	40 MMBtu/hr Wood 25 MMBtu/hr Propane	Process equipment w/fuel burning
OSB Press	N/A	Process Equipment
OSB Sander and Tongue & Groove Operation	N/A	Process Equipment
Waste Fines Handling System	N/A	Process Equipment
Strander Pneumatic System	N/A	Process Equipment

Emergency Diesel Fire Pump #1	1.3 MMBtu/hr	Fuel Burning
Emergency Diesel Fire Pump #2	1.3 MMBtu/hr	Fuel Burning
Spray Booths (2)	N/A	Process Equipment

Louisiana-Pacific has additional insignificant activities which do not need to be listed in the emission equipment table above. The list of insignificant activities can be found in the Part 70 license application and in Appendix B of Chapter 140 of the Department's Regulations.

C. Application Classification

The application for Louisiana-Pacific does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 of the Department's regulations for a Part 70 source.

II. FACILITY AND EMISSION UNIT DESCRIPTIONS

A. Process Overview

Louisiana-Pacific manufactures oriented strand board (OSB) from poplar and other softwood and hardwood species. The facility was previous owned by Georgia-Pacific. A transfer was issued July 3, 2003 to change the ownership from Georgia-Pacific to Louisiana-Pacific.

Louisiana-Pacific purchases poplar and other softwood and hardwood logs that are stored at the facility's wood yard prior to use in the OSB process. The logs are cut, then fed to a debarker and put into hot ponds for conditioning. The logs then go to the strander, which cuts them into 'wafers'. The wafers are stored in two storage bins. The bins are arranged to supply a continuous delivery of wafers to the two dryers.

The two dryers process wafers to be used in the core as well as the top and bottom surface of the final board. Both dryers normally fire wood, but may also fire propane. Wafers are conveyed to the core and surface dryers, where the moisture content is reduced to approximately 5%.

Each dryer has a dedicated cyclone system. Exhaust gases, wafers, and fines are drawn into the primary cyclones where the wafers and fines are separated from the exhaust gases. The gases continue into a wet ESP and are discharged to the atmosphere via the stack. The water from the ESP goes to the Domtar pulp mill wastewater treatment facility in Woodland.

The wafers discharging from the separate cyclones are conveyed into the two rotary dryer screens (the core screen and the surface screen). The screens remove fines, which are fed to the wood fuel system. The dried wafers are then conveyed to the two dry strand storage bins.

Dry wafers are fed to two blenders, where powdered resin and wax are added at a rate controlled by the final product characteristics. From the blenders, the wafers are conveyed to the surge hoppers located in the forming heads over the forming line.

The wafers are metered from the formers onto a continuous moving screen line system. The core wafers are random, while the bottom and top wafers are placed in a specific orientation. The continuous formed mat is separated and cut into 8' x 16' length and then deposited into the press by the press loader, which accumulates 16 flights of mats prior to loading the press. The press system includes the necessary hydraulic equipment, heating oil circulation system and controls. Emissions from the press vent to the atmosphere.

Finished rough boards are unloaded from the press. Each of the 16 finished rough boards are cut into four 4' x 8' panels. The trimmed boards are conveyed to be edge sealed, banded, and placed in the warehouse for shipment.

Some of the 4' x 8' panels are made into a flooring product by sanding, notching, and placing a tongue and groove in the panel before applying the edge seal. These operations are completed at the tongue and groove (T & G) line.

All bark, broken ends, small ends and wood waste from the beginning of the process, as well as all dry trim material and sawdust is reclaimed for use as fuel. The dryers use white waste wood such as fines and sander dust as fuel. All other waste wood is hogged and used as fuel by the boiler.

B. Chapters 138 and 134, NO_X and VOC Reasonable Available Control Technology (RACT)

The facility was issued a NO_X RACT amendment in March 1997 (A-126-72-G-A), pursuant to Chapter 138 of the Department's regulations since the facility has the potential to emit over 100 tons of NO_X. The amendment addressed NO_X RACT requirements for the wood boiler, the core dryer, and the surface dryer. The NO_X RACT findings are incorporated into this license.

The facility was issued a VOC RACT amendment in April 1999 (A-126-72-I-A), pursuant to Chapter 134 of the Department's regulations since the facility emits over 40 tons of VOC. Subsequent amendments also addressed VOC

requirements. The sources subject to VOC RACT include the two dryers and the press vent. The VOC RACT findings are incorporated into this license.

C. Maximum Achievable Control Technology (MACT)

The Environmental Protection Agency (EPA) is issuing MACTs for the control of hazardous air pollutants. These MACTs are found in 40 CFR, Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAPs) and 40 CFR, Part 63, NESHAPs for Source Categories.

Louisiana-Pacific will likely be applicable to at least two MACTS: 40 CFR Part 63, Subpart DDDD: NESHAP for Plywood and Composite Wood Products and 40 CFR Part 63, Subpart DDDDD: NESHAP for Industrial/Commercial/Institutional Boilers and Process Heaters.

D. Wood Boiler

Unit Description
The wood waste boiler was manufactured in 1975 by Kipper, with a maximum heat input capacity of 190 MMBtu/hr. The boiler fires primarily wood waste, but is also allowed to fire other fuels, including specification waste oil, sludge from the Domtar's wastewater treatment plant, oily rags, wipe cleaners, and general mill yard waste, including, but not limited to, paper waste, cardboard, cores, wood wastes, precure (board that did not get sufficiently pressed, which then gets hogged into fuel) and rejected wood fibers. Emissions from the boiler exhaust through a wet scrubber and exit through a 110 foot stack.

The wood waste boiler is not subject to the New Source Performance Standards, 40 CFR Part 60 for boilers (Subparts D, Da, Db, Dc) because of the size and age of the unit.

The wood waste boiler was part of the facility's NO_X RACT submittal and shall meet the limits in Chapter 138 of the Department's regulations. The wood waste boiler may be subject to 40 CFR Part 63, Subpart DDDDD.

Previous licenses did not have the emission limits for the wood waste boiler specifically listed. The emission limits for this license were calculated based on BPT findings in the file and the following:

PM: Chapter 103
SO_2: EPA's AP-42 factor (Table 1.6-2, Sept. 03, for wood boilers)
NO_X: Chapter 138
CO: EPA's AP-42 factor (Table 1.6-2, Sept. 03, for wood boilers)
VOC: EPA's AP-42 factor (Table 1.6-3, Sept. 03, for wood boilers)

Control Equipment
Control equipment for the wood waste boiler is a multiclone separator followed by a 1979 wet variable throat scrubber.

Streamlining
1. Opacity
   Chapter 101, Section (2)(B)(1)(e) of the Department's regulations contains the applicable opacity standard for the wood waste boiler (30%, except for two six minute block averages in a 3-hour period). No streamlining is required for the opacity limit.

2. Particulate Matter (PM)
   a. Chapter 103, Section (2)(A)(3)(b) contains the applicable PM lb/MMBtu emission standard for the wood waste boiler (0.3 lb/MMBtu). No streamlining is required for the PM lb/MMBtu limit.
   b. BPT establishes the applicable lb/hr emission limit for the wood waste boiler. No streamlining is required for the PM lb/hr limit.

3. PM_{10}
   BPT establishes the applicable PM_{10} lb/hr emission limit for the wood waste boiler. No streamlining is required for the lb/hr limit.

4. Sulfur Dioxide (SO_2)
   BPT establishes the applicable SO_2 lb/hr emission limit for the wood waste boiler. No streamlining is required for the SO_2 lb/hr limit.

5. Nitrogen Oxides (NO_X)
   a. Chapter 138, Section (3)(B)(2) of the Department's regulations contains applicable NO_X lb/MMBtu emission limits for the wood waste boiler (0.3 for biomass on a 1 hour average). No streamlining is required for the NO_X lb/MMBtu limit.
   b. BPT establishes the applicable NO_X lb/hr emission limit for the wood waste boiler. No streamlining is required for the NO_X lb/hr limit.

6. Carbon Monoxide (CO)
   BPT establishes the applicable CO lb/hr emission limit for the wood waste boiler. No streamlining is required for the CO lb/hr limit.

7. Volatile Organic Compounds (VOC)
   BPT establishes the applicable VOC lb/hr emission limit for the wood waste boiler. No streamlining is required for the VOC lb/hr limit.

Periodic Monitoring
Periodic monitoring for the wood waste boiler shall consist of maintaining fuel use records, maintaining a log of the pressure drop across the scrubber, stack testing every other year for particulate matter, stack test once within the five year term of this license for NO_X, and inspection and maintenance of pollution control equipment. Fuel use records will be calculated based on steam production and a factor derived from information including manufacturers test results and an assumption of 50% moisture fuel.

(Note that the periodic monitoring in this license relating to the wood waste boiler pressure drop across the scrubber may be superceded by the continuous monitoring system requirements by 40 CFR Part 63, Subpart DDDDD by the timeframes set forth in the rule.)

E. Dryers

Unit Description
The Core and Surface Line Dryers are each rated at 40.0 MMBtu/hr firing wood and 25 MMBtu/hr firing propane. The dryers were installed in 1980.

The dryers were part of the facility's NO_X RACT submittal and a lb/MMBtu limit was established. The dryers were also part of the facility's VOC RACT submittal which addressed a lb/hr VOC limit from the wet ESP, a dry flake moisture of no less than 5% (wet basis), and a lb/hr PM emissions limit from the wet ESP. Subsequently, amendments were issued revising the VOC RACT PM and VOC limits from the dryer.

The dryers may be subject to 40 CFR Part 63, Subpart DDDD.

Previous licenses did not have the emission limits for the wet ESP exhaust specifically listed. The emission limits for this license were calculated based on BPT findings in the file and the following:

PM: Chapter 134, VOC RACT and amendment A-126-71-P-A
SO_2: EPA's AP-42 factor (Table 1.6-2, Sept. 03, for wood burners)
NO_X: Chapter 138, NO_X RACT
CO: EPA's AP-42 factor (Table 10.6.1-2, March 2002, for OSB dryers)
VOC: Chapter 134, VOC RACT and amendment A-126-71-P-A

Control Equipment
Control equipment on the dryers includes a cyclone for each dryer and a wet ESP to control the exhaust gases from the cyclones. An ESP operates by removing particles from flue gas using electric charge. The metal plates of the ESP impart a charge on the particles and the particles are attracted to a collection electrode. In a wet ESP, the collected particles are removed from the collection electrode with

water. Louisiana-Pacific is allowed to dispose of this waste water by mixing with the wafers in the wet storage bins, by adding it to the log conditioning ponds, or for use in the ash enclosure and/or pumping down to Domtar's wastewater treatment facility.

Streamlining

1. Opacity
   Chapter 101, Section (2)(B)(3)(d) of the Department's regulations contains the applicable opacity standard for the wet ESP (20%, except for 1 six minute block average in a 1 hour period). No streamlining is required for the opacity limit.

2. Particulate Matter (PM)
   a. Chapter 105 of the Department's regulations contains applicable PM emission limits.
   b. Chapter 134, VOC RACT, establishes the applicable PM emission limit from the wet ESP exhaust (9.35 lb/hr).

   Louisiana-Pacific accepts streamlining for the PM limit, therefore only the more stringent Chapter 134 lb/hr limit is included in this license.

3. PM_{10}
   BPT establishes the applicable PM_{10} lb/hr emission limit for the wet ESP exhaust. No streamlining is required for the lb/hr limit.

4. Sulfur Dioxide (SO_2)
   BPT establishes the applicable SO_2 lb/hr emission limit for the wet ESP exhaust. No streamlining is required for the SO_2 lb/hr limit.

5. Nitrogen Oxides (NO_X)
   a. Chapter 138, Section (3)(H) of the Department's regulations required an alternative NO_X RACT for the dryers (0.3 lb/MMBtu). No streamlining is required for the NO_X lb/MMBtu limit.
   b. BPT establishes the applicable NO_X lb/hr emission limit for the wet ESP exhaust. No streamlining is required for the NO_X lb/hr limit.

6. Carbon Monoxide (CO)
   BPT establishes the applicable CO lb/hr emission limit for the wet ESP exhaust. No streamlining is required for the CO lb/hr limit.

7. Volatile Organic Compounds (VOC)
   Chapter 134, VOC RACT establishes the applicable VOC lb/hr emission limit for the wet ESP exhaust (51.15 lb/hr). No streamlining is required for the VOC lb/hr limit.

Periodic Monitoring

Periodic monitoring for the dryers shall consist of maintaining fuel use records, recording wet ESP secondary voltage and secondary current on each field once per shift, stack testing every other calendar year for PM and VOC, and inspection and maintenance logs of pollution control equipment. Fuel use record keeping shall demonstrate the average tons of biomass burned per 24 hour period and the amount of propane fired per month. Records of fuel use shall also be kept on a monthly and 12 month rolling total. Fuel use records shall be based on a revolution counter on the fuel feed screw auger. Louisiana-Pacific shall develop a factor correlating the amount of fuel used per revolution of the screw auger.

(Note that the periodic monitoring in this license relating to the dryer control equipment may be superceded by the continuous monitoring system requirements by 40 CFR Part 63, Subpart DDDD by the timeframes set forth in the rule.)

F. Press

Unit Description

Following the Dryers, the hydraulic press compacts the wood flakes and additives (wax, resin, etc) into OSB product. Emissions from the press are vented though three stacks above the press (press vents), each with a 50" roof fan. The Press was installed in 1980 and the press vents were installed in 1995.

The press was part of the VOC RACT analysis. The conclusion was that no add on controls are necessary at this time to control VOCs from the press.

The press vent may be subject to 40 CFR Part 63, Subpart DDDD.

Previous licenses did not have the emission limits for the press specifically listed. The emission limits for this license were calculated based on BPT findings in the file and the following:

PM: Data presented in the 1995 renewal application
NO_X: EPA's AP-42 factor (Table 10.6.1-5, March 2002, for OSB presses)
CO: Data presented in the 1995 renewal application
VOC: Chapter 134, VOC RACT

Streamlining

1. Opacity
   Chapter 101, Section (2)(B)(3)(d) of the Department's regulations contains the applicable opacity standard for the press vent (20%, except for 1 six minute

block average in a 1 hour period). No streamlining is required for the opacity limit.

2. Particulate Matter (PM)
   a. Chapter 105 of the Department's regulations contains applicable PM emission limits.
   b. BPT establishes the applicable PM emission limit from the press vent.

   Louisiana-Pacific accepts streamlining for the PM limit, therefore only the more stringent BPT lb/hr limit is included in this license.

3. PM_{10}
   BPT establishes the applicable PM_{10} lb/hr emission limit for the press vent. No streamlining is required for the lb/hr limit.

4. Nitrogen Oxides (NO_X)
   BPT establishes the applicable NO_X lb/hr emission limit for the press vent. No streamlining is required for the NO_X lb/hr limit.

5. Carbon Monoxide (CO)
   BPT establishes the applicable CO lb/hr emission limit for the press vent. No streamlining is required for the CO lb/hr limit.

6. Volatile Organic Compounds (VOC)
   BPT establishes the applicable VOC lb/hr emission limit for the press vent. No streamlining is required for the lb/hr limit.

Periodic Monitoring
Periodic monitoring for the press vent is maintenance of production records demonstrating tons of product output on a daily average computed on a weekly basis and an annual average daily production basis. LP OSB shall also perform stack testing for PM and VOC in 2005 and 2006, then every other calendar year thereafter.

G. <u>Hazardous Air Pollutant (HAP) Emissions</u>

Description

The main sources of HAPs (lead, arsenic, benzene, acetaldehyde, acrolein, formaldehyde, methanol and phenol) at Louisiana-Pacific are the dryers and the press vent. The boiler also emits a small amount of HAPS. The HAPs from the process sources will be addressed in 40 CFR Part 63, Subpart DDDD.

H. OSB Sander and Tongue and Groove (T & G) Operation

Unit Description

The OSB sander was installed in 1985.

Control Equipment
The control equipment on the sander is a fabric filter baghouse.

Streamlining
1. Opacity
   Chapter 101, Section (2)(B)(3)(c) of the Department's regulations contains the applicable opacity standard for the baghouse. (10%, except for 1 six minute block average in a 1 hour period). No streamlining is required for the opacity limit.

2. Particulate Matter (PM)
   a. Chapter 105 contains an applicable PM emission standard for process sources. Meeting the opacity limit meets the Chapter 105 requirements.
   b. Chapter 101 establishes an opacity limit for baghouses.

   Louisiana-Pacific accepts streamlining for the PM emissions from the OSB sander baghouse, therefore only the more stringent Chapter 101 opacity limit is included in this license.

Periodic Monitoring
Periodic monitoring for the OSB sander baghouse shall consist of recordkeeping of baghouse inspection and maintenance, and all process and control equipment malfunctions that cause excess emissions.

I. Waste Fines Handling System

Description

The waste fines handling system, installed in 1984, is used to capture the wood dust off of the process. The wood dust is then used as dry wood fuel in the boiler or the dryers.

Control Equipment

The control equipment on the waste fines handling system is a fabric filter baghouse.

Streamlining

1. Opacity
   Chapter 101, Section (2)(B)(3)(c) of the Department's regulations contains the applicable opacity standard for the baghouse. (10%, except for 1 six minute block average in a 1 hour period). No streamlining is required for the opacity limit.

2. Particulate Matter (PM)
   a. Chapter 105 contains an applicable PM emission standard for process sources. Meeting the opacity limit meets the Chapter 105 requirements.
   b. Chapter 101 establishes an opacity limit for baghouses.

   Louisiana-Pacific accepts streamlining for the PM emissions from the waste fines handling system baghouse, therefore only the more stringent Chapter 101 opacity limit is included in this license.

Periodic Monitoring
Periodic monitoring for the waste fines handling system baghouse shall consist of recordkeeping of baghouse inspection and maintenance, and all process and control equipment malfunctions that cause excess emissions.

J. Strander Pneumatic System

Description

The strander system processes wood logs into strands. The current strander replaced the waferizer in 1995.

Control Equipment

The control equipment on the strander pneumatic system is a cyclone.

Streamlining

1. Opacity
   Chapter 101, Section (2)(B)(3)(d) of the Department's regulations contains the applicable opacity standard for the cyclone. (20%, except for 1 six minute block average in a 1 hour period). No streamlining is required for the opacity limit.

2. Particulate Matter (PM)
   a. Chapter 105 contains an applicable PM emission standard for process sources. Meeting the opacity limit meets the Chapter 105 requirements.

b. Chapter 101 establishes an opacity limit for baghouses.

Louisiana-Pacific accepts streamlining for the PM emissions from strander pneumatic system cyclone, therefore only the more stringent Chapter 101 opacity limit is included in this license.

Periodic Monitoring
Periodic monitoring for the strander pneumatic system cyclone shall consist of recordkeeping of cyclone inspection and maintenance, and all process and control equipment malfunctions that cause excess emissions.

K. Emergency Diesel Fire Pumps

Description
Louisiana-Pacific has two emergency diesel fire pumps, each rated at 1.3 MMBtu/hr and both fire diesel fuel with a maximum 0.05% sulfur content. Although the units are under the insignificant activity threshold, they are included in the license since the potential to emit, without operational limits, is above the 10 ton/year NO_X RACT exemption. In lieu of NO_X RACT requirements, the units will be restricted to operating 500 hours/year, based on a 12 month rolling total. Emission limits were based on AP-42 factors (Table 3.3-1, Oct. 96).

Streamlining
1. Opacity
   Chapter 101, Section (2)(B)(1)(d) of the Department's regulations contains the applicable opacity standard for the emergency diesel fire pumps (20%, except for 2 six minute averages in a three hour period). No streamlining is required for opacity.

2. Particulate Matter (PM)
   BPT establishes the applicable lb/hr emission limit. No streamlining is required for the lb/hr limit.

3. PM_{10}
   BPT establishes the applicable PM_{10} lb/hr emission limit. No streamlining is required for the lb/hr limit.

4. Sulfur Dioxide (SO_2)
   a. Chapter 106, Section (2)(A)(2) of the Department's regulations contains an applicable fuel sulfur content standard (2%).
   b. BPT establishes an applicable fuel sulfur content standard (0.05%).
   c. BPT establishes the applicable SO_2 lb/hr emission limit. No streamlining is required for the lb/hr limit.

Louisiana-Pacific accepts streamlining for the fuel sulfur content standard for the emergency diesel fire pumps, therefore only the more stringent BPT fuel sulfur content is included in this license.

5. Nitrogen Oxides (NO_X)
   BPT establishes the applicable NO_X lb/hr emission limits. No streamlining is required for the lb/hr limit.

6. Carbon Monoxide (CO)
   BPT establishes the applicable CO lb/hr emission limit. No streamlining is required for the lb/hr limit.

7. Volatile Organic Compounds (VOC)
   BPT establishes the applicable VOC lb/hr emission limit. No streamlining is required for the lb/hr limit.

Periodic Monitoring
Periodic monitoring for the emergency diesel fire pumps shall consist of maintaining records of fuel sulfur percent by weight (based on fuel supplier certifications or delivery receipts) and hours of operation.

L. Spray Booths

Description
Louisiana-Pacific has two spray booths (that vent inside) for applying edgeseal and logo stencil paint to the oriented strand boards.

Control Equipment
The control equipment on the spray booths is paper-type filters.

Streamlining
Volatile Organic Compounds (VOC)
BPT establishes the applicable VOC tons/year emission limit from the spray booth operations (3 ton/yr). No streamlining is required for the 12 month rolling total emission limit.

Periodic Monitoring
Louisiana-Pacific shall keep records of edgeseal and paint usage and VOC emissions from the edgeseal and paint on a monthly and 12 month rolling total basis.

M. Fugitives Particulate Matter Emissions

Description
Louisiana-Pacific has various areas with fugitive particulate matter emissions including material stockpiles, paved, and unpaved surfaces. These areas shall be maintained to minimize emissions.

Streamlining
Opacity
Chapter 101, Section (2)(B)(4)(a) of the Department's regulations contain the applicable opacity standard for fugitive emissions (20%, except for 5 minutes in any one hour). No streamlining is required for the opacity limit.

N. Gasoline Tank

Description
Louisiana-Pacific is licensed to operate a 1079 gallon gasoline storage tank. The gasoline storage tank is subject to Chapter 118 of the Department's regulations. The gasoline storage tank was manufactured and installed in 1991. Based on its size, the tank is not subject to 40 CFR Part 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels).

Periodic Monitoring
Periodic monitoring for the gasoline storage tank consists of maintaining records of the monthly and annual throughput of gasoline.

O. Wipe Cleaner

Description
Louisiana-Pacific does not utilize any parts washers at the facility, but does perform 'wipe cleaning'. The wipe cleaning process is not subject to the Equipment and Operations Standards section of Chapter 130 of the Department's regulations, but is subject to the Handling, Storage and Disposal of Materials Containing VOC section of the rule. The wipe cleaners are an allowable boiler fuel.

P. Facility Emissions

Total Licensed Annual Emissions for Louisiana-Pacific
Tons/Year
(used to calculate the annual license fee)

Equipment	**PM**	**PM_{10}**	**SO_2**	**NO_X**	**CO**	**VOC**
Boiler	250	250	21	250	500	14
Dryers	41	41	9	105	683	224
Press Vents	53	53	--	0.2	23	31
Emergency Fire Pumps #1 and #2 total	0.2	0.2	0.03	2.9	0.6	0.2
Spray Booths total						3
Totals	**344**	**344**	**30**	**358**	**1207**	**272**

III. AIR QUALITY ANALYSIS

Louisiana-Pacific previously submitted an ambient air quality analysis. A revised ambient air quality analysis was reviewed by the Department and accepted November 2, 1999 demonstrating that emissions from the facility, in conjunction with all other sources, do not violate ambient air quality standards. An additional ambient air quality analysis is not required for this Initial Part 70 License.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-126-70-A-I pursuant to MEDEP Chapter 140 and the preconstruction permitting requirements of MEDEP Chapter 115 and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Louisiana-Pacific pursuant to the Department's preconstruction permitting requirements in Chapters 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

Standard Statements

(1) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both;

(2) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;

(3) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.

(4) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license;

(5) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.

(6) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:

A. Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or

B. The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to Section 114 of the CAA.

The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated October, 1997.

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
i.	Boiler	40 CFR Part 60, Subparts C, Ca, and Cb	NSPS for Municipal Waste Combustors	The only waste burned is generated by the plant or the pulp mill currently owned by Domtar. Biomass, pulp mill treatment sludge, wood wastes, and general millyard waste are not 'municipal waste'.
ii.	Boiler	40 CFR Part 60, Subparts D, Da, Db, Dc	NSPS for Steam Generating Units	The boiler is not subject, based on size, fuel fired, and date constructed (prior to June 9, 1989).
iii.	Boiler	Chapter 117, COM requirement	Continuous Opacity Monitor requirement	The boiler is equipped with an approved wet scrubber.
iv.	Boiler	Chapter 134	VOC RACT	Boilers are exempt from the regulation

v.	Press Vents	Chapter 138	NO_X RACT	Exempt since the press emits less than 10 tpy NO_X
vi.	Gasoline Storage Tank	40 CFR Part 60, Subpart Kb	NSPS for Volatile Organic Liquid Vessels	Exempt based on tank size

(7) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:

A. Additional Applicable requirements under the CAA become applicable to a Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;

B. Additional requirements (including excess emissions requirements) become applicable to a Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;

C. The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 license; or

D. The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

(8) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license.

Standard Conditions

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department

deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (Title 38 MRSA §347-C);

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140;

(3) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request;
Enforceable by State-only

(4) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 MRSA §353.

(5) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions;
Enforceable by State-only

(6) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;

(7) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license.

(8) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

A. perform stack testing under circumstances representative of the facility's normal process and operating conditions:

i. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;

ii. to demonstrate compliance with the applicable emission standards; or

iii. pursuant to any other requirement of this license to perform stack testing.

B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and

C. submit a written report to the Department within thirty (30) days from date of test completion.

Enforceable by State-only

(9) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and

C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

Enforceable by State-only

(10) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and conditions of the air emission license.

A. The licensee shall notify the Commissioner within 48 hours of a violation of any emission standard and/or a malfunction or breakdown in any component part that causes a violation of any emission standard, and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

B. The licensee shall submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component part causes a violation of any emission standard, together with any exemption requests.

Pursuant to 38 MRSA § 349(9), the Commissioner may exempt from civil penalty an air emission in excess of license limitations if the emission occurs during start-up or shutdown or results exclusively from an unavoidable malfunction entirely beyond the control of the licensee and the licensee has taken all reasonable steps to minimize or prevent any emission and takes corrective action as soon as possible. There may be no exemption if the malfunction is caused, entirely or in part, by poor maintenance, careless operation, poor design or any other reasonably preventable condition or preventable equipment breakdown. The burden of proof is on the licensee seeking the exemption under this subsection.

C. All other deviations shall be reported to the Department in the facility's semiannual report.

(11) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

(12) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.

(13) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequently if specified in the applicable requirement or by the Department. The compliance certification shall include the following:

A. The identification of each term or condition of the Part 70 license that is the basis of the certification;

B. The compliance status;

C. Whether compliance was continuous or intermittent;

D. The method(s) used for determining the compliance status of the source, currently and over the reporting period; and

E. Such other facts as the Department may require to determine the compliance status of the source;

Special Conditions

(14) **Boiler**

A. Emissions from the wood fired boiler (190 MMBtu/hr) shall not exceed the following:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
PM	0.3	MEDEP Chapter 103	-
NO_X	0.3	MEDEP Chapter 138, NO_X RACT	-

Pollutant	Lb/hr	Origin and Authority	Enforceability
PM	57.0	MEDEP Chapter 140, BPT	**Enforceable by State-only**
PM_{10}	57.0	MEDEP Chapter 140, BPT	**Enforceable by State-only**
SO_2	4.75	MEDEP Chapter 140, BPT	**Enforceable by State-only**
NO_X	57.0	MEDEP Chapter 140, BPT	**Enforceable by State-only**
CO	114.0	MEDEP Chapter 140, BPT	**Enforceable by State-only**
VOC	3.23	MEDEP Chapter 140, BPT	**Enforceable by State-only**

B. Louisiana-Pacific shall operate a multiclone and wet scrubber as emission control for the wood boiler exhaust. The scrubber shall operate at all times the boiler is in operation. [MEDEP Chapter 134, VOC RACT]

C. Other Fuels

1. In the wood boiler, Louisiana-Pacific may fire ‘other fuels’, including specification waste oil, sludge from Domtar’s wastewater treatment plant, oily rags, wipe cleaners, and general mill yard waste, including, but not

limited to, paper waste, cardboard, cores, wood wastes, precure, and rejected wood fibers.

2. Louisiana-Pacific shall maintain monthly and 12 month rolling total records of the 'other fuels' fired in the boiler. Louisiana-Pacific shall not exceed the current licensed air emission limits when firing 'other fuels'. The results of the waste oil analysis shall be kept on site documenting that the oil meets the definition of specification waste oil.

[MEDEP Chapter 140, BPT]

D. Louisiana-Pacific shall operate the wood boiler such that visible emissions from the stack does not exceed 30% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour block period. [MEDEP Chapter 101]

E. Boiler Periodic Monitoring
   1. Louisiana-Pacific shall maintain monthly and 12 month rolling total records of fuel use for the boiler. Fuel use records shall be calculated based on steam production and a lb steam per lb fuel factor. The derivation of the factor shall be maintained on file at the facility.
   2. Louisiana-Pacific shall maintain a log detailing the annual overhaul and all routine and non-routine maintenance on the multicyclone on the wood boiler. Louisiana-Pacific shall keep a log documenting the date and nature of all multicyclone failures.
   3. Louisiana-Pacific shall maintain a log of the pressure drop across the scrubber on the wood boiler and shall record the pressure drop once per day when in the boiler is in operation. If Louisiana-Pacific is subject to the requirements of 40 CFR Part 63, Subpart DDDDD, the periodic monitoring relating to the boiler scrubber may be superceded by the continuous monitoring requirements of the NESHAP.
   4. Louisiana-Pacific shall maintain a log detailing all routine and non-routine maintenance on the scrubber.
   5. Louisiana-Pacific shall perform particulate matter (PM) stack testing on the scrubber exhaust in 2006 and every other calendar year thereafter per 40 CFR Part 60, Appendix A, Method 5, or other methods or testing scenarios approved by the Department. [MEDEP Chapter 140, BPT]
   6. Louisiana-Pacific shall perform nitrogen oxide (NO_X) stack testing on the scrubber exhaust once during the five year term of this license per 40 CFR Part 60, Appendix A, Method 7, or other methods or testing scenarios approved by the Department. [MEDEP Chapter 140, BPT]

[MEDEP Chapter 140, BPT]

(15) **Core and Surface Line Dryers**

A. Louisiana-Pacific shall fire only wood, wood waste from the process, and/or propane in the two dryers. [MEDEP Chapter 140, BPT]

B. Louisiana-Pacific shall operate a cyclone on each dryer, followed by a common ESP to control the exhaust gases from the two dryer cyclones. [MEDEP Chapter 140, BPT]

C. Emissions from the dryers' wet ESP shall not exceed the following:

Pollutant	lb/MMBtu	Origin and Authority	Enforceability
NO_X	0.3	MEDEP Chapter 138, NO_X RACT	-

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	9.35	MEDEP Chapter 134, VOC RACT	-
PM_{10}	9.35	MEDEP Chapter 140, BPT	**Enforceable by State-only**
SO_2	2.0	MEDEP Chapter 140, BPT	**Enforceable by State-only**
NO_X	24.0	MEDEP Chapter 140, BPT	**Enforceable by State-only**
CO	156	MEDEP Chapter 140, BPT	**Enforceable by State-only**
VOC	51.15	MEDEP Chapter 134, VOC RACT	-

D. Visible emissions from the ESP stack shall not exceed 20% on a six minute block average basis, except for no more than 1 six minute block average in a 1 hour period. [MEDEP Chapter 101]

E. Louisiana-Pacific shall operate, at a minimum, the number of ESP chambers and number of fields per chamber of its wet ESP that were in operation during the most recent demonstration of compliance with the licensed particulate emission limit when the dryers are operating. The dryers are considered operating when flakes are being added to either dryer. [MEDEP Chapter 140, BPT]

F. Dry Flake Moisture

1. Louisiana-Pacific shall maintain a dry flake moisture at no less than 5% (wet basis), based on a 24 hour block average (7am-7pm).

2. Dry flake moisture shall be measured by Louisiana-Pacific. The automated moisture system shall be the primary equipment used for testing. These measurements shall be verified twice per shift by a manual test of flake moisture content to be conducted in the facility's quality control lab, and these measurements shall be recorded. If the moisture content is found to be different by more than 1.5%, more verification tests

shall be completed. If the difference is confirmed, the calibration procedure shall be initiated. In the event of moisture meter downtime, manual samples will be taken at least once every two hours, and the results recorded.

[MEDEP Chapter 134, VOC RACT]

G. Dryer/Cyclone/ESP Periodic Monitoring

1. Louisiana-Pacific shall maintain monthly and 12 month rolling total records of fuel use for the dryers**.** Wood fuel use records shall be based on a revolution counter on the fuel feed screw auger and a fuel use factor (fuel used per auger revolution). Propane fuel use records shall be on a monthly basis from purchasing records. [MEDEP Chapter 140, BPT]
2. Louisiana-Pacific shall maintain a log detailing all routine and non-routine maintenance on each of the cyclones on the two dryers. Louisiana-Pacific shall keep a log documenting the date and nature of all cyclone failures. [MEDEP Chapter 140, BPT]
3. Louisiana-Pacific shall record the voltage and amperage once every shift for the ESP. The requirement to record voltage and amperage does not apply during periods of downtime of the ESP or periods when the dryers are not operating. The periodic monitoring in this license relating to the requirements of the dryer ESP may be superceded by 40 CFR Part 63, Subpart DDDD. [MEDEP Chapter 140, BPT]
4. Louisiana-Pacific shall maintain a log detailing all routine and non-routine maintenance on the ESP. [MEDEP Chapter 140, BPT]
5. Louisiana-Pacific shall perform particulate matter (PM) stack testing on the wet ESP exhaust in 2006 and every other calendar year thereafter pursuant to 40 CFR Part 60, Appendix A, Method 5, or other methods or testing scenarios approved by the Department. [MEDEP Chapter 134, VOC RACT]
6. Louisiana-Pacific shall stack test the outlet of the wet ESP for volatile organic compounds (VOC) in 2006 and every other calendar year thereafter pursuant to 40 CFR Part 60, Appendix A, Method 25A, or other methods or testing scenarios approved by the Department. Results shall be expressed in lb/hr as carbon equivalents. [MEDEP Chapter 134, VOC RACT]

(16) **Press Vents**

A. Total emissions from the press vents shall not exceed the following:

Pollutant	lb/hr	Origin and Authority	Enforceability
PM	12.1	MEDEP Chapter 140, BPT	**Enforceable by State-only**
PM_{10}	12.1	MEDEP Chapter 140, BPT	**Enforceable by State-only**
NO_X	0.05	MEDEP Chapter 140, BPT	**Enforceable by State-only**
CO	5.3	MEDEP Chapter 140, BPT	**Enforceable by State-only**
VOC	7.0	MEDEP Chapter 140, BPT	**Enforceable by State-only**

B. Visible emissions from each press vent shall not exceed 20% on a six minute block average basis, except for no more than 1 six minute block average in a 1 hour period. [MEDEP Chapter 101]

C. Press Vents Periodic Monitoring:
1. Louisiana-Pacific shall perform particulate matter (PM) stack testing on the Press Vents in 2005, again in 2006, then every other calendar year thereafter pursuant to 40 CFR Part 60, Appendix A, Method 5, or other methods or testing scenarios approved by the Department. [MEDEP Chapter 140, BPT]
2. Louisiana-Pacific shall perform volatile organic compounds (VOC) stack testing on the Press Vents in 2005, again in 2006, then every other calendar year thereafter pursuant to 40 CFR Part 60, Appendix A, Method 25A, or other methods or testing scenarios approved by the Department. Results shall be expressed in lb/hr as carbon equivalents. [MEDEP Chapter 140, BPT]

(17) **Raw Materials**

A. Raw Materials Periodic Monitoring:
Louisiana-Pacific shall operate with a green wood furnish supply not to exceed 20% softwood species on a daily average, calculated from weekly usage and days of operation. If testing is performed that indicates compliance is maintained with a greater percentage of softwood, the percentage may be increased based on test results and Department approval. The facility's established standard operating procedures for the percent softwood calculations shall be used, involving the collection and checking of information from the P&H Crane Operations, the Deck Crane Operators, and the Quality Technicians. [MEDEP Chapter 134, VOC RACT]

B. Louisiana-Pacific may use alternative glues, waxes, resins, release agents, or other substances in the process upon notification to the Department. Louisiana-Pacific may run trials with such new substances for a period of up

to 90 days. Louisiana-Pacific shall provide notice to the Department not later than 2 weeks after permanently switching to new substances. Upon request of the Department, Louisiana-Pacific may be required to conduct stack tests to demonstrate compliance with this license after making the permanent switch to a new substance. [MEDEP Chapter 140, BPT]

(18) **Production Rates**

Production Rate Periodic Monitoring:
Louisiana-Pacific shall maintain records documenting daily production rates, 7 day rolling average daily production rates, and 12 month average daily production rates as a 12 month rolling total.

Louisiana-Pacific shall perform additional stack tests to demonstrate compliance with applicable emission limits upon Department request. In determining whether to require Louisiana-Pacific to conduct such testing, the Department shall consider the production levels during prior emission tests conducted by Louisiana-Pacific and the frequency at which the increased production levels are achieved by the facility.

[MEDEP Chapter 140, BPT]

(19) **Hazardous Air Pollutants**

Louisiana-Pacific shall comply with applicable requirements of 40 CFR Part 63, Subpart DDDD: NESHAP for Plywood and Composite Wood Products. [40 CFR Part 63, Subpart DDDD]

(20) **OSB Sander and Tongue and Groove Operations**

A. Visible emissions from the sander baghouse shall not exceed an opacity of 10% on a six minute block average basis, except for no more than 1 six minute block average in a 1 hour period. The facility shall take corrective action if visible emissions from the baghouse exceeds 5% opacity. [MEDEP Chapter 101]

B. OSB Sander Periodic Monitoring
Louisiana-Pacific shall maintain a log detailing all routine and non-routine maintenance on the baghouse. The log shall include the location, date, and nature of all bag failures. [MEDEP Chapter 140, BPT]

(21) **Waste Fines Handling System**

A. Visible emissions from the waste fines baghouse shall not exceed an opacity of 10% on a six minute block average basis, except for no more than 1 six minute block average in a 1 hour period. The facility shall take corrective action if visible emissions from the baghouse exceeds 5% opacity. [MEDEP Chapter 101]

B. Waste Fines Handling System Periodic Monitoring
Louisiana-Pacific shall maintain a log detailing all routine and non-routine maintenance on the baghouse. The log shall include the location, date, and nature of all bag failures. [MEDEP Chapter 140, BPT]

(22) **Strander Pneumatic System**

A. Visible emissions from the strander pneumatic cyclone shall not exceed an opacity of 20% on a six minute block average basis, except for no more than 1 six minute block average in a 1 hour period. [MEDEP Chapter 101]

B. Strander Pneumatic System Periodic Monitoring
Louisiana-Pacific shall maintain a log detailing all routine and non-routine maintenance on the cyclone. The log shall include the location, date, and nature of all cyclone failures. [MEDEP Chapter 140, BPT]

(23) **Emergency Diesel Fire Pumps**

A. Emissions from the Emergency Diesel Fire Pumps #1 and #2 (1.3 MMBtu/hr each) shall each not exceed the following:

Pollutant	**lb/hr**
PM	0.4
PM_{10}	0.4
SO_2	0.06
NO_X	5.7
CO	1.2
VOC	0.5

[MEDEP Chapter 140, BPT]

B. Visible emissions from each of the two emergency diesel fire pumps shall not exceed 20% opacity on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour block period. [MEDEP Chapter 101]

C. Louisiana-Pacific is licensed to fire diesel fuel with a maximum fuel sulfur content of 0.05% sulfur in the emergency diesel fire pumps. [MEDEP Chapter 140, BPT]

D. Louisiana-Pacific is limited to operating each of the two emergency diesel fire pumps 500 hours per year on a 12 month rolling total basis. [MEDEP Chapter 140, BPT]

E. Emergency Diesel Fire Pumps' Periodic Monitoring
   1. Louisiana-Pacific shall maintain monthly and 12 month rolling total operating records for each of the two emergency diesel fire pumps.
   2. Louisiana-Pacific shall maintain sulfur fuel content records for the diesel fuel fired in the two emergency diesel fire pumps, based on fuel supplier certifications or delivery receipts.

   [MEDEP Chapter 140, BPT]

(24) **Spray Booths**

A. Emissions from the spray booths shall not exceed a total of 3 tons/year VOC, based on a 12 month rolling total. [MEDEP Chapter 140, BPT]

B. Spray Booth Periodic Monitoring
   Louisiana-Pacific shall maintain records of monthly edgeseal and paint use and the associated VOC emissions on a monthly and 12 month rolling total. [MEDEP Chapter 140, BPT]

(25) **General Process Sources**

Visible emissions from any general process source not specifically addressed in this license shall not exceed an opacity of 20% on a 6 minute block average basis, except for no more than 1 six minute block average in a 1 hour period.
[MEDEP Chapter 101]

(26) **Fugitive Emissions**

Potential sources of fugitive PM emissions, including material stockpiles and roadways, shall be controlled by wetting with water, with calcium chloride, or other methods, as needed, as approved by the Bureau of Air Quality to prevent visible emissions in excess of 20% opacity, except for no more than 5 minutes in any 1 hour period. Compliance shall be determined by an aggregate of the individual 15 second opacity observations which exceed 20% in any 1 hour. [MEDEP Chapter 101]

(27) **Gasoline Storage Tank**

A. The fill pipe shall extend within 6 inches of the bottom of the gasoline storage tank. [MEDEP Chapter 118]

B. Louisiana-Pacific shall maintain records of the monthly and annual throughput of gasoline. [MEDEP Chapter 118]

(28) **Units Containing Ozone Depleting Substances**

When repairing or disposing of units containing ozone depleting substances, the licensee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioning units in Subpart B. An example of such units include refrigerators and any size air conditioner that contain CFCs.
[40 CFR Part 82, Subpart F]

(29) **Wipe Cleaning**

Vapor-tight containers shall be used for the storage of spent or fresh material containing VOC and for the storage or disposal of cloth or paper impregnated with VOC that are used for surface preparation, clean up or coating removal. [MEDEP Chapter 130]

(30) **Semiannual Reporting**

Louisiana-Pacific shall submit semiannual reports every six months to the Bureau of Air Quality. The semiannual reports are due on July 30th and Jan 30th of each year with the initial semiannual report due July 30, 2005. The first semiannual report shall cover the period from the date of issuance of this license to the end of the reporting period. The semiannual report shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date.

A. Each semiannual report shall include a summary of the periodic monitoring required by this license. The periodic monitoring includes boiler fuel use records, maintenance logs on the boiler multiclone and the boiler scrubber, pressure drop across the boiler scrubber, fuel use records for the dryers, maintenance logs on the dryers' cyclones and the dryers' ESP, ESP voltage and amperage, records of softwood percentages, flake moisture, records of production, and maintenance logs on additional process baghouses and cyclones.

B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.

[MEDEP Chapter 140]

(31) **Annual Compliance Certification**

Louisiana-Pacific shall submit an annual compliance certification to the Department in accordance with Standard Condition (13) of this license. The initial annual compliance certification is due January 30 of each year with the initial annual certification due January 30, 2006. The annual compliance certification shall be considered on-time if the postmark of the submittal is before the due date or if the report is received by the DEP within seven calendar days of the due date.

Certification of compliance is to be based on the stack testing or monitoring data required by this license. Where the license does not require such data, or the license requires such data upon request of the Department and the Department has not requested the testing or monitoring, compliance may be certified based upon other reasonably available information such as the design of the equipment or applicable emission factors. [MEDEP Chapter 140]

(32) **Annual Emission Statement**

In accordance with MEDEP Chapter 137, Louisiana-Pacific shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

A. A computer program and accompanying instructions supplied by the Department;

or

B. A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017
Phone: (207) 287-2437

[MEDEP Chapter 137]

(33) **Air Toxics Emission Statement**

In accordance with MEDEP Chapter 137, Louisiana-Pacific shall report in a timeframe designated to the Department, the information necessary to accurately update the State's toxic air pollutants emission inventory by means of a written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions on the Air Toxics emissions inventory portion should be directed to:

Attn: Toxics Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

[MEDEP Chapter 137]

(34) **General Applicable State Regulations**

Louisiana-Pacific is subject to the State regulations listed below.

Origin and Authority	Requirement Summary	Enforceability
Chapter 102	Open Burning	-
Chapter 109	Emergency Episode Regulation	-
Chapter 110	Ambient Air Quality Standard	-
Chapter 116	Prohibited Dispersion Techniques	-

(35) **Asbestos Abatement**

When undertaking Asbestos abatement activities, Louisiana-Pacific shall comply with the Standard for Asbestos Demolition and Renovation 40 CFR Part 61, Subpart M. [40 CFR Part 61, Subpart M]

(36) **Certification by a Responsible Official**

All reports (including quarterly reports, semiannual reports, and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]

(37) **Annual Fee**

Louisiana-Pacific shall pay the annual air emission license fee within 30 days of December 31 of each year. Pursuant to Title 38-353-A, failure to pay this annual fee in the stated timeframe is sufficient grounds for revocation of the license under section 341-D, subsection 3. [MEDEP Chapter 140]

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2004.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of Phase I application: March 16, 1998
Date of Phase I application acceptance: March 18, 1998
Date of initial receipt of Phase II application: October 12, 1999
Date of Phase II application acceptance: October 25, 1999

Date filed with the Board of Environmental Protection _____

This Order prepared by Kathleen E. Tarbuck, Bureau of Air Quality.